



NRO-139-11

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

Douglas W. Domenech
Secretary of Natural Resources

13901 Crown Court, Woodbridge, Virginia 22193
(703) 583-3800 Fax (703) 583-3821
www.deq.virginia.gov

David K. Paylor
Director

June 1, 2011

Mr. Mark Bisett
Manager, Environmental Compliance
Transcontinental Gas Pipe Line Corporation
Compressor Station 185
10201 Balls Ford Road
Manassas, Prince William County, Virginia 20109

Registration No.: 71958

Dear Mr. Bisett:

Attached is a renewal Title V permit to operate your facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all conditions carefully.

This approval to operate does not relieve Transcontinental Gas Pipe Line Corporation of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

Mr. Mark Bisett
Page 2
June 1, 2011

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please contact the regional office at 703-583-3858.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Darton", with a long horizontal flourish extending to the right.

Terry H. Darton
Regional Air Permit Manager

TAF/THD/EHA/11-139-TV

Attachments: Permit

cc: Manager, Data Analysis (electronic file submission)
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III
Manager/Inspector, Air Compliance
File



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David K. Paylor
Director

Thomas A. Faha
Regional Director

Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

| | |
|----------------------|--|
| Permittee Name: | Transcontinental Gas Pipe Line Corporation |
| Facility Name: | Transcontinental Gas Pipe Line Corporation Compressor Station 185 |
| Facility Location: | 10201 Balls Ford Road Manassas, Prince William County, Virginia 20109 |
| Registration Number: | 71958 |
| Permit Number: | NRO-71958 |

June 1, 2011

Effective Date

May 31, 2016

Expiration Date

Thomas A. Faha
Regional Director

June 1, 2011
Signature Date

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I. Facility Information

Permittee

Transcontinental Gas Pipe Line Corporation
P.O. Box 1396
Houston, Texas 77251-1396

Responsible Official

Mark Bisett
Manager, Environmental Compliance

Facility

Transcontinental Gas Pipe Line Corporation
Compressor Station 185
10201 Balls Ford Road
Manassas, Prince William County, Virginia 20109

Contact Person

Michael C. Callegari
Senior Environmental Scientist
(713) 215-4584

County-Plant Identification Number: 51-153-00086

Facility Description: SIC Code: 4922 – Natural Gas Transmission

Transco is an interstate natural gas transmission company. Transco's 1,900-mile pipeline system transports natural gas from areas in the Gulf Coast region to customers in the northeast. Transco's compressor stations are used to compress and move the gas along the system. Gas compression at this facility is made possible through the operation of ten Ingersoll-Rand natural gas-fired spark ignited reciprocating internal combustion engines (four stroke, lean burn) and their associated compressors.

The facility is a Title V major source of NO_x, VOC, and CO. The source is located in an ozone nonattainment area as well as the ozone transport region (OTR). Station 185 is a major source of hazardous air pollutants (HAPS) also based on its potential to emit both formaldehyde and aggregated HAP emissions. The facility is currently permitted under a minor NSR permit dated April 10, 2001.

II. Emission Units

| Emission Unit | Stack ID | Emission Unit Description | Size/Rated Capacity | Combustion Technology | Pollution Control Device | Pollutant Controlled | Applicable Permit Date |
|---------------|----------|---|---------------------|---|--------------------------------------|---|---------------------------|
| M/L 1 | 01 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | High Pressure Fuel Injection (HPFi) for NOx & VOC Reduction | Catalytic Oxidation for CO reduction | Nitrogen Oxides (NOx) and Volatile Organic Compounds (VOC) controlled by HPFi, Carbon Monoxide (CO) Controlled by Catalytic Oxidation | April 10, 2001 NSR Permit |
| M/L 2 | 02 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |
| M/L 3 | 03 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |
| M/L 4 | 04 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |
| M/L 5 | 05 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |

| Emission Unit | Stack ID | Emission Unit Description | Size/Rated Capacity | Combustion Technology | Pollution Control Device | Pollutant Controlled | Applicable Permit Date |
|---------------|----------|---|---------------------|-----------------------|--------------------------|----------------------|---------------------------|
| M/L 6 | 06 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |
| M/L 7 | 07 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |
| M/L 8 | 08 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |
| M/L 9 | 09 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |
| M/L 10 | 10 | Ingersoll-Rand 412-KVS DT Series Reciprocating Internal Combustion Engine | 2000 hp | HPFi | Catalytic Oxidation | NOx CO & VOC | April 10, 2001 NSR Permit |
| A/C 1 | 11 | Caterpillar G3306 air compressor | 203 hp | - | - | - | April 10, 2001 NSR Permit |
| IA1 | 12 | Caterpillar G-3508 emergency electric generator | 534 hp | - | - | - | April 10, 2001 NSR Permit |

| Emission Unit | Stack ID | Emission Unit Description | Size/Rated Capacity | Combustion Technology | Pollution Control Device | Pollutant Controlled | Applicable Permit Date |
|---------------|----------|---|---------------------|-----------------------|--------------------------|----------------------|------------------------------|
| IA2 | 13 | Caterpillar G-3508 emergency electric generator | 534 hp | - | - | - | April 10, 2001 NSR Permit |

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement, but may serve to determine the applicability of state or federal requirements.

III. Fuel Burning Equipment Requirements

A. Limitations

1. Emissions from the operation of each natural gas fired mainline compressor engine (M/L 1 through M/L 10) shall not exceed the limits specified below:

| | <u>Single Engine</u> | | <u>Total 10 Engines</u> |
|---|----------------------|----------------|-------------------------|
| 2. Nitrogen Oxides (as NO _x) | 17.6 lbs/hr | 77.08 tons/yr. | 771 tons/yr. |
| Carbon Monoxide (CO) | 4.2 lbs/hr | 18.4 tons/yr. | 184 tons/yr |
| Volatile Organic Compounds (VOC) | 1.7 lbs/hr | 7.45 tons/yr. | 74.5 tons/yr |

(9 VAC 5-50-260, 9 VAC 5-80-110, and Condition 11 of the April 10, 2001 NSR Permit)

3. Visible emissions from the natural gas-fired compressor engines shall not exceed twenty percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty percent opacity as determined by the United States Environmental Protection Agency (EPA) Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-260, 9 VAC 5-80-110, and Condition 12 of the April 10, 2001 NSR Permit)
4. The Caterpillar Model G3306 203 horsepower air compressor (Ref No. A/C 1) is restricted to the fuel limitation listed below. Usage shall be calculated monthly as the sum of the previous consecutive twelve months usage.

Natural Gas: Maximum twelve month Usage: 9.03×10^6 cubic feet

(9 VAC 5-50-50, 9 VAC 5-80-110, and Condition 9 of the April 10, 2001 NSR Permit)

5. Emissions from the operation of the Caterpillar Model G-3306 203 horsepower air compressor (Ref No. A/C 1) shall not exceed the limits specified below:

| | | |
|-----------------|-------------|---------------|
| Nitrogen Oxides | 5.0 lbs/hr. | 13.2 tons/yr. |
| Carbon Monoxide | 5.8 lbs/hr. | 15.5 tons/yr. |
6. These emissions are based upon the average of three, one-hour test runs. Annual emissions shall be calculated as the sum of each consecutive twelve-month period.

Exceedance of the operating limits shall be considered credible evidence of exceedance of emission limits. These emissions are derived from the estimated overall emission contribution from operating limits and emission factors supplied by the permittee. Compliance with these emission limits shall be determined by the Virginia Department of Environmental Quality (DEQ) approved emission factors and fuel throughput limits as stated in Condition III.A.3.

(9 VAC 5-50-260, 9 VAC 5-80-110 and Condition 10 of the April 10, 2001 NSR Permit)

7. The two natural gas fired Caterpillar G-3508 emergency electric generators (Ref. No. IA-1 and IA-2) shall not operate more than 500 hours per year each, calculated monthly as the sum of each consecutive twelve month period.
(9 VAC 5-170-160, 9 VAC 5-80-110, and Condition 7 of the April 10, 2001 NSR Permit)
8. The approved fuel for all emission units is pipeline quality natural gas. A change in fuel may require a permit to modify and operate.
(9 VAC 5-170-160, 9 VAC 5-80-110, and Condition 5 of the April 10, 2001 NSR Permit)
9. The two natural gas fired Caterpillar G-3508 electric generators (Ref. No. IA-1 and IA-2) shall operate solely as emergency stationary reciprocating internal combustion engines as defined in 40 CFR 63.6675.
(9 VAC 5-80-110 and 40 CFR 63.6640(f))

B. Monitoring and Recordkeeping

1. The permittee shall determine the concentration of nitrogen oxides (NO_x), CO, and O₂ from the exhaust stream of two of the ten mainline internal combustion compressor engines (one FT model and one DT model) each calendar year, beginning with the effective date of this permit. Each year, a new pair of engines (one FT model and one DT model) shall be chosen, so that by the end of each five year period, all ten engines will have been tested. NO_x emissions shall represent the combined measured emissions of NO and NO₂, and shall be reported collectively as NO_x. Emissions shall be reported in appropriate units to demonstrate compliance with the emission limits established in Section III.A.1. The testing shall be conducted in the following manner:
 - a. Even numbered years the permittee shall use approved EPA reference methods as presented in Condition III.C.4 of this permit.
 - b. Odd numbered years the permittee shall use EPA Conditional Test Method (CTM) 034 – Determination of Oxygen, Carbon Monoxide, and Oxides of Nitrogen from Stationary Sources for Periodic Monitoring, except that data collection shall take place for a minimum of fifteen minutes, rather than the two minutes required by CTM-034. In the event DEQ finds the data submitted in

conjunction with CTM-034 does not demonstrate compliance with the applicable emissions limits established in Section III.A.1, the permittee shall retest using approved EPA reference methods as presented in Condition III.C.4 of this permit.

The first such test event under this permit term shall be completed prior to the end of the calendar year of this permit issuance. Successive tests shall be performed no closer than ten months but no further than fourteen months apart. The details of the tests are to be agreed upon with the Regional Air Compliance Manager of the DEQ's NRO.

(9 VAC 5-80-110 E)

2. If the measured emission rate of NO_x or CO (as determined in accordance with conditions III.B.1) exceeds the emission limit for the respective pollutant, the permittee shall:

Verify that the internal combustion compressor engine(s) (Reference # M/L1 – M/L10) are operating according to the manufacturer's specifications, or other predetermined site-specific acceptable operating conditions. If an internal combustion compressor is not operating properly, the permittee shall take corrective action immediately to reduce emissions to or below the emission standard. The permittee shall document pollutant emission rates within one week of applying corrective action to an internal combustion compressor by measuring the concentration of pollutant(s) in the exhaust gases. The measurement shall be conducted in accordance with procedures approved in advance by the Regional Air Compliance Manager of the DEQ's NRO.

If the corrective action in Condition III.B.2.a above does not rectify the emission excursion, the permittee shall conduct a compliance test for the specific pollutant(s) of concern within thirty days of completing the corrective action on the internal combustion compressor(s). The additional compliance testing shall be conducted in accordance with approved EPA reference methods as presented in Condition III.C.4 of this permit, or other procedures approved in advance by the Regional Air Compliance Manager of the DEQ's NRO.

(9 VAC 5-80-110 E)

3. The permittee shall maintain records of the required internal combustion compressors operator training and air compressor operator training. The records shall include a statement of time, place and nature of training provided. In addition, the permittee shall maintain records of scheduled and unscheduled maintenance on the internal combustion compressors and air compressor. These records shall be kept on site for a period of five years, and shall be made available for inspection by the DEQ upon request.

(9 VAC 5-80-110)

4. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be agreed upon with the Regional Air Compliance Manager of the DEQ's NRO. These records shall include, but are not limited to:
 - a. The yearly throughput of natural gas consumed by the air compressor (Ref. No. A/C 1), calculated monthly as the sum of previous consecutive twelve-month period.
 - b. The number of hours of operation of each emergency engine-generator (Ref. No IA-1 and IA-2) calculated monthly as the sum of each consecutive twelve month period.
 - c. Date and reason for operation of each emergency engine-generator (Ref. No. IA-1 and IA-2) to demonstrate compliance with Condition III.A.7.
 - d. Monthly records that include the monthly and annual consumption of natural gas fuel, in cubic feet, for each compressor unit (Ref. No. M/L 1 – M/L 10). The annual throughput shall be calculated monthly as the sum of each consecutive twelve-month period.
 - e. Monthly and annual NO_x, CO, and VOC emission calculated for each mainline compressor unit (Ref. No. M/L 1 – M/L 10). The annual emissions shall be calculated monthly as the sum of each consecutive twelve-month period.
 - f. Monthly and annual NO_x, CO, and VOC emission calculated for the air compressor unit (Ref. No. A/C 1). The annual emissions shall be calculated monthly as the sum of each consecutive twelve-month period.
 - g. Scheduled and unscheduled maintenance, and operator training.
 - h. All stack tests, visible evaluations and performance evaluations.

Compliance for the consecutive twelve month period referenced in subsections a., b., d., e., and f. above shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.

(9 VAC 5-80-110, 9 VAC 5-50-50, and Condition 16 of the April 10, 2001 NSR Permit)

C. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request by the DEQ, test ports shall be provided at the appropriate locations.
(9 VAC 5-40-30, 9 VAC 5-80-110, and Condition 6 of the April 10, 2001 NSR Permit)
2. Upon request by the DEQ, the permittee shall conduct performance tests for nitrogen oxides from the air compressor and the ten gas compressor engines to demonstrate compliance with the emission limits contained in this permit. The details of the tests shall be agreed upon with the Regional Air Compliance Manager of the DEQ's NRO.
(9 VAC 5-50-30 G, 9 VAC 5-80-110, and Condition 14 of the April 10, 2001 Permit)
3. Upon request by the DEQ the permittee shall conduct visible emission evaluations from the air compressor engine and the ten gas compressor engines to demonstrate compliance with the visible emission limits contained in this permit. The details of the tests shall be agreed upon with the Regional Air Compliance Manager of the DEQ's NRO.
(9 VAC 5-50-30 G, 9 VAC 5-80-110, and Condition 15 of the April 10, 2001 NSR Permit)
4. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

| Pollutant/Parameter | Test Method |
|---------------------|--|
| NO _x | (40 CFR Part 60, Appendix A) EPA Method 7, 7E |
| CO | EPA Method 10 |
| VOC | EPA Methods 18, 25, 25a |
| Visible Emission | EPA Method 9 |
| O ₂ | EPA Method 3a |
| Stack Flow | EPA Method 19 |

Alternate test methods may be used if they are arranged with, and approved by the Regional Air Compliance Manager of the DEQ's NRO at least thirty days prior to the test.

(9 VAC 5-80-110 E)

D. Reporting

1. Reporting of emission excursions above an applicable emission standard shall be conducted in accordance with the permit deviation reporting procedures in Condition VI.E. The report shall be submitted by March 1st and September 1st of each year to coincide with or be incorporated into the semi annual reporting requirements in Condition VI.C.3. In addition, two copies of the test results from any compliance

testing performed as a result of an emission excursion shall be provided to the Regional Air Compliance Manager of the DEQ's NRO within thirty days of conducting the test.

(9 VAC 5-80-110 F)

2. The general requirements and procedures set forth in Section VI, Condition C through F of this permit shall be followed with respect to reporting requirements for the internal reciprocating engines, and air compressor engine. The report shall be submitted by March 1st and September 1st of each year to coincide with or be incorporated into the semi-annual reporting requirements in Condition VI.C.3.

(9 VAC 5-80-110 F)

IV. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

| Emission Unit No. | Emission Unit Description | Citation | Pollutant(s) Emitted (9 VAC 5-80-720 B) | Rated Capacity (9 VAC 5-80-720 C) |
|-------------------|---|-------------------|---|-----------------------------------|
| IA5 | Burnham 3L-125-G-GP Natural Gas Fired Boiler/Space Heater | 9 VAC 5-80-720 C. | N/A | 5.23 MMBtu/hr. |
| IA6 | Jacket Water Storage Tank | 9 VAC 5-80-720 B | VOC | N/A |
| IA7 | Lube Oil Cooling Water Surge tank | 9 VAC 5-80-720 B | VOC | N/A |
| IA8 | Oil Sump | 9 VAC 5-80-720 C. | N/A | 390 Gallons |
| IA9 | Condensate Storage Tank #1 | 9 VAC 5-80-720 B | VOC, HAP | N/A |
| IA10 | Ethylene Glycol/Water Storage Tank | 9 VAC 5-80-720 B | VOC | N/A |
| IA11 | Ethylene Glycol Storage Tank | 9 VAC 5-80-720 B | VOC | N/A |
| IA12 | Used Oil Storage Tank | 9 VAC 5-80-720 B | VOC | N/A |
| IA13 | Boiler Condensate Storage tank | 9 VAC 5-80-720 B | VOC | N/A |
| IA14 | Diesel Storage Tank #1 | 9 VAC 5-80-720 B | VOC | N/A |
| IA15 | Diesel Storage Tank #2 | 9 VAC 5-80-720 B | VOC | N/A |
| IA16 | Condensate Storage Tank #2 | 9 VAC 5-80-720 B | VOC, HAP | N/A |
| IA17 | Wastewater Storage Tank | 9 VAC 5-80-720 B | VOC, HAP | N/A |

| Emission Unit No. | Emission Unit Description | Citation | Pollutant(s) Emitted (9 VAC 5-80-720 B) | Rated Capacity (9 VAC 5-80-720 C) |
|-------------------|---------------------------|------------------|---|-----------------------------------|
| IA18 | Storm Water Sump #1 | 9 VAC 5-80-720 B | VOC | N/A |
| IA19 | Storm Water Sump #2 | 9 VAC 5-80-720 B | VOC | N/A |
| IA20 | Cold Parts Washer | 9 VAC 5-80-720 B | VOC | N/A |
| IA21 | Lube Oil Storage Tank | 9 VAC 5-80-720 B | VOC | N/A |

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Parts Washer identified as IA20 is an insignificant emission unit according to 9 VAC 5-80-720 B, but 9 VAC 5-40-3260 is applicable.

V. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

| Citation | Title of Citation | Description of Applicability |
|-----------------------------|---|--|
| 40 CFR Part 63 Subpart HH | National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Oil and Natural Gas Production | Applies to facilities that process, upgrade, or store (1) hydrocarbon liquids and (2) natural gas from the well up to and including the natural gas processing plant. Station 185 is a transmission facility, therefore, is not subject to the requirements of the subpart. |
| 40 CFR Part 63, Subpart HHH | National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Natural Gas Transmission and Storage | Applies to facilities that process, upgrade, transport or store natural gas prior to delivery to a local distribution company, or final end user. The owner or operator of a major source of HAP must reduce HAP emissions from glycol dehydration units. Station 185 does not contain any glycol dehydration units, and is not subject to the requirements of this subpart. |

| Citation | Title of Citation | Description of Applicability |
|-------------------------|--|---|
| 40 CFR Part 68 | Chemical Accident Prevention Provisions | Applies to stationary sources that have more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115. The definition of Stationary Source does not apply to transportation under the provision of the subpart. |
| 40 CFR 64 | Compliance Assurance Monitoring | Applies to facilities equipped with pollution control devices with potential pre-control device emissions greater than 100 TYP. The ten mainline compressors do not have an uncontrolled Carbon Monoxide PTE greater than 100 tpy therefore 40 CFR 64 is not applicable to Station 185. |
| CAA, Section 112(r) – | Risk Management Plans | Station 185 does not qualify as a “Stationary Source” under the definitions section in 40 CFR 68.3. This section specifically excludes transportation related activities that are regulated under 49 CFR 192, 193, or 195. |
| 40 CFR 60, Subpart JJJJ | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines | Applies to new/reconstructed/modified spark ignition (SI) internal combustion engines (ICE), regardless of hp rating. Station 185 does not plan to install new or reconstructed, or modify and existing SI ICE, therefore the standards of Subpart JJJJ are not applicable |
| 40 CFR 63, Subpart ZZZZ | National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. | The mainline engines (Ref No M/L 1 – M/L 10) are 4 stroke lean burn exempted from requirements per Section 63.6590 (b)(3)(ii) and the emergency electrical generators (Ref No IA1 and IA2) are used for emergency purposes only and therefore exempt from the requirements per Section 63.6590 (b)(3)(iii). |

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

VI. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or

Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,

- (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 of each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the prior annual period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
2. The identification of each term or condition of the permit that is the basis of the certification.
3. The compliance status.
4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
6. Such other facts as the permit may require to determine the compliance status of the source.
7. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3 APD Permits@epa.gov

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Northern Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within fourteen days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition VI.C.3 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Northern Regional Office by facsimile transmission, telephone, electronic communication, or telegraph of such failure or malfunction and shall within fourteen days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Regional Director, Northern Regional Office.

(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-

80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)
2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-40-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times, substances, or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within thirty days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify

the Board of the change in source name within thirty days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

BB. Future Applicable Requirements

In addition to the legally binding documents and regulations currently in effect, the permitted facility shall be subject to future applicable requirements. Unless otherwise determined in the future, future requirements already known to apply to this facility include, but are not limited to:

1. National Emissions Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Boilers (40 CFR Part 63, Subpart DDDDD).
2. National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) (Ref No. A/C 1 only)